

EXHIBIT
“A”

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK**

WUHU HUA SHENG ORE LIMITED

Verified Complaint

-against -

**Index No. 603657/2016
Purchased:**

NENG GUAN REN a/k/a ALAN REN

TO THE SUPREME COURT OF THE STATE OF NEW YORK,

Plaintiff, Wuhu Hua Sheng Ore Limited, through its undersigned attorneys, respectfully alleges upon personal knowledge as to Plaintiff, and upon information and belief as to all other matters as follows:

1. Plaintiff is a foreign corporation with its principal place of business in the People's Republic of China.
2. Defendant is an individual domiciled at 38 Lorijean Lane, East Northport, Suffolk County, New York.
3. This Court has jurisdiction over the defendant by virtue of CPLR § 301.
4. Venue is the county where defendant resides.

FOR ITS FIRST CAUSE OF ACTION

5. On or about August 8, 2014, Defendant executed and delivered a Promissory Note in favor of Plaintiff. (Exhibit A)
6. This promissory note states that Defendant owes Plaintiff \$2,515,464, and that interest continues to accrue at 1.5% per month.
7. The note represented a debt justly due and owing to plaintiff.

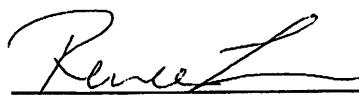
8. There was consideration for this promissory note.
9. On August 5, 2013, Plaintiff made a down payment of 2,515,464 to NBN (HK) Limited for goods.
10. NBN (HK) Limited did not produce the goods or return the money to Plaintiff.
11. Defendant is an owner of NBN (HK) Limited, a foreign corporation.
12. On August 8, 2014, Defendant personally guaranteed in writing that these funds would be paid to Plaintiff.
13. Plaintiff has demanded that Defendant pay the amount owed.
14. Defendant has not paid the money owed.
15. Defendant has refused to pay.
16. By reason of the foregoing, Plaintiff is due \$2,515,464 from the defendant with interest thereon at 1.5% per month from August 5, 2013.

WHEREFORE, Plaintiff demands judgment against Defendant in the amount of \$2,515,464, plus interest from August 5, 2013, costs and fees of this action, and for such other and further relief that this Court may deem just.

Dated: New York New York
July 5, 2016

Respectfully Submitted,

By:



Renee M. Levine, Esq.
Of Counsel
Goldberger & Dubin, P.C.
401 Broadway, Suite 306
New York, New York 10013

VERIFICATION

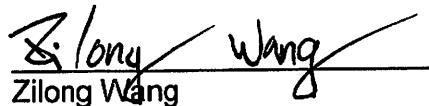
STATE OF NEWYORK)
) ss.:
COUNTY OF NEW YORK)

The undersigned being duly sworn, deposes and says that:

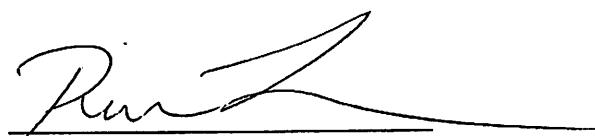
I am an officer of Wuhu Hua Sheng Ore Limited in the within action. I have read the foregoing Verified Complaint and know the contents thereof. The contents are true to my own knowledge except as to matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

Wuhu Hua Sheng Ore Limited

By:


Zilong Wang

Sworn to before me on this
5th day of July, 2016


Notary Public

RENEE M. LEVINE
NOTARY PUBLIC-STATE OF NEW YORK
No. 02LE6278248
Qualified In New York County
My Commission Expires March 25, 2017